

EXHIBIT A

In re Facebook

Search-Term Negotiation Template

Group Number _____

Custodian	Data Sources	RFPs	Facebook's Proposed Search Terms	Plaintiffs' Proposed Search Terms With Tracked Changes to Facebook's Proposal
Joe Smith	Email; text messages; Workplace chat	1, 3	((apples or oranges) w/20 (tree* or bush)) and fruit (sky w/10 clouds) w/15 (storm* or thunder* or lightening)	((apples or oranges) w/20 (tree* or bush)) and fruit (sky w/10 clouds) w/ 15 25 (storm* or thunder* or lightening*) (grass* or weed* or flower* or plant*) w/20 sun*

Step 1 -- paste in table from Word

Custodian	Data Sources	RFPs	Facebook's Proposed Search Terms	Plaintiffs' Proposed Search Terms With Tracked Changes to Facebook's Proposal
Joe Smith	Email; text messages; Workplace chat	1, 3	((apples or oranges) w/20 (tree* or bush)) and fruit (sky w/10 clouds) w/15 (storm* or thunder* or lightening)	((apples or oranges) w/20 (tree* or bush)) and fruit (sky w/10 clouds) w/ 15 25 (storm* or thunder* or lightening*) (grass* or weed* or flower* or plant*) w/20 sun*

Step 2 -- combine search terms into one cell

Custodian	Data Sources	RFPs	Facebook's Proposed Search Terms	Plaintiffs' Proposed Search Terms With Tracked Changes to Facebook's Proposal
Joe Smith	Email; text messages; Workplace chat	1, 3	((apples or oranges) w/20 (tree* or bush)) and fruit (sky w/10 clouds) w/15 (storm* or thunder* or lightening)	((apples or oranges) w/20 (tree* or bush)) and fruit (sky w/10 clouds) w/15 25 (storm* or thunder* or lightening*) (grass* or weed* or flower* or plant*) w/20 sun*

Step 3 -- duplicate row for each RFP

Custodian	Data Sources	RFPs	Facebook's Proposed Search Terms	Plaintiffs' Proposed Search Terms With Tracked Changes to Facebook's Proposal
Joe Smith	Email; text messages; Workplace chat	1	((apples or oranges) w/20 (tree* or bush)) and fruit (sky w/10 clouds) w/15 (storm* or thunder* or lightening)	((apples or oranges) w/20 (tree* or bush)) and fruit (sky w/10 clouds) w/15 25 (storm* or thunder* or lightening*) (grass* or weed* or flower* or plant*) w/20 sun*
Joe Smith	Email; text messages; Workplace chat	3	((apples or oranges) w/20 (tree* or bush)) and fruit (sky w/10 clouds) w/15 (storm* or thunder* or lightening)	((apples or oranges) w/20 (tree* or bush)) and fruit (sky w/10 clouds) w/15 25 (storm* or thunder* or lightening*)